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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Implementation of the Pay)
Telephone Reclassification and)
Compensation Provisions of the)
Telecommunications Act of 1996)
)

CC Docket No. 96-128

CC Docket No. 91-35

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AT&T'S COMMENTS ON AMERITECH'S
COMPARABLY EFFICIENT INTERCONNECTION PLAN

Pursuant to the Commission's Public Notice released December 4, 1996,¹ AT&T Corp. ("AT&T") hereby submits these comments on Ameritech's comparably efficient interconnection ("CEI") plan for payphone service providers.²

In its CEI plan, Ameritech states generally that it will purchase and use the same tariffed services that are available to other providers of payphone services, in accordance with Section 276(b)(1)(C) of the Act. Ameritech

¹ Pleading Cycle Established for Comments on Ameritech's Comparably Efficient Interconnection Plan for Payphone Service Providers, Public Notice, CC Docket No. 96-128, DA 96-2025, released December 4, 1996.

² The Commission required the Bell Operating Companies ("BOCs") to file CEI plans in Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order, FCC 96-388, released September 20, 1996 ("Payphone Order"); and Order on Reconsideration, FCC 96-349, released November 8, 1996 ("Reconsideration Order").

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further states that it will satisfy the Commission's additional requirement that the BOCs meet the nonstructural safeguards standards adopted for their enhanced service offerings in Computer Inquiry III.³ In these comments, AT&T seeks clarification of certain aspects of Ameritech's service that are not specifically addressed in the CEI plan.

First, Ameritech's CEI plan and accompanying tariff pages are silent as to the treatment of network-based functionalities for inmate payphones. However, it is AT&T's understanding that Ameritech owns and operates inmate payphones that use certain network-based functionalities that are not currently available under tariff to operators of non-Ameritech payphones. To ensure that Ameritech is not treating its affiliated inmate payphones differently than the inmate payphones of other providers, the Commission should require Ameritech to set forth expressly in its CEI plan and tariffs the network-based functionalities for inmate payphones that are currently available and make them available to all payphone service providers.⁴ Moreover,

³ See Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer Inquiry III), Report and Order, 104 F.C.C.2d 958 (1986).

⁴ "The safeguards the Commission adopted in Computer III and ONA include: (1) nondiscriminatory access to network features and functionalities [These] nonstructural safeguards must be applied to meet our obligation under the 1996 Act." Payphone Order, para.

(footnote continued on following page)

Ameritech should state explicitly that it will obtain those functionalities for its own inmate payphones at the same rates and under the same terms and conditions as are available to other payphone services providers.

Ameritech should also make clear that its Independent Payphone Provider ("IPP") coin line service will be made available on a non-discriminatory basis to all payphone service providers. This service provides certain functions, such as coin control and coin rating, to customer provided payphones that are commonly referred to as "dumb sets." Despite the statement in Ameritech's CEI plan (p. 6) that "Ameritech will file tariffs for [its IPP coin line service] features in each of its states by January 15, 1997," those tariffs that are already filed state only that IPP coin line service will be "available only from appropriately equipped central offices."⁵ At a minimum, Ameritech should be required to amend its CEI plan to

(footnote continued from previous page)

200 (citations omitted). The Commission also noted that "any basic services provided by a BOC to its payphone affiliate must be available on a nondiscriminatory basis to other payphone providers." Id.

⁵ See, e.g., Ameritech's catalog for Indiana, Part 13, Section 2, Original Sheet No. 9, attached as Attachment A to Ameritech's CEI Plan.

clarify that the IPP coin line service will be available to non-Ameritech payphone service providers at every central office where such service is provided to Ameritech's payphone service affiliate, and to reflect such conditions of availability in its tariffs.

Moreover, it is not clear why Ameritech is not prepared to offer, on an unbundled basis, the specific features and functions that it has listed on pp. 4-5 of its CEI plan.⁶ Ameritech claims (pp. 4-5) that "the complete unbundling of all individual coin telephone line functionality is not technically feasible," because the "coin line features are integrated in the central office hardware and software in such a way that individual features cannot be offered separately." However, Ameritech already offers some of these functionalities on an unbundled basis for its Independent Payphone Provider (non-coin line) services.⁷ In order to ensure nondiscriminatory access to,

⁶ Ameritech currently offers coin rating, coin supervision, coin control, and call screening only as part of a package with the basic IPP coin line service. These functionalities will not be separately available. See CEI Plan, pp. 4-5.

⁷ See, e.g., Indiana Bell Telephone Company Tariff, Part 13, Section 2, Original Sheet No. 9 (Certain optional features may be obtained by the payphone service provider, including call screening and operator services).

and pricing of, Ameritech's network features, the Commission should require Ameritech to unbundle and offer under tariff for its coin line service, at a minimum, those features that it currently provides in connection with its IPP non-coin line service on an unbundled basis. Ameritech should also be required to explain in greater detail why it is unable to offer separately each IPP coin line service functionality listed on pp. 4-5 of its CEI plan that it claims must be provided on a bundled basis.⁸

Ameritech's CEI plan also fails to address the Commission's requirement that LECs ensure transmission of codes that enable interexchange carriers to track payphone calls. Pursuant to the Reconsideration Order (para. 94), Ameritech is required to offer services "that provide a discrete code to identify payphones that are maintained by non-LEC providers." Accordingly, Ameritech should provide, in its CEI plan, detail on the types of codes it will use to

⁸ Similarly, Ameritech's CEI plan includes an illustrative federal tariff page describing only two unbundled IPP coin line functions -- Outgoing Only Service and Restricted Coin Access. This illustrative federal tariff does not reflect all of the features that Ameritech states that it will offer, even on a bundled basis (see n.6, supra). Also, the illustrative federal tariff suffers from the same deficiency as the state tariffs, in that the available features and functions are not being made available on an unbundled basis. The federal illustrative tariff should be modified to reflect the amendments to the CEI plan noted above.

identify Ameritech payphones and the payphones of non-affiliated providers. Whatever codes Ameritech chooses to use, those codes should be transmitted for both IPP service and IPP coin line service, in order to prevent discrimination between users of the different services.

Ameritech should also clarify the status of its Message Delivery Service ("MDS"). This service permits a person who encounters a busy or no answer condition when placing a call from a payphone to record and send a message at a later time to the called party. In its CEI plan, Ameritech states that it intends to conduct a trial of this service at some unspecified time.⁹ However, this is not the first time Ameritech has indicated that it planned to trial MDS. Nearly two years ago Ameritech filed a Notification of its intent to trial MDS, and to AT&T's knowledge no further document on this matter was filed with the Commission.¹⁰ As a result of the confusion caused by these two filings, Ameritech should clarify the status of the MDS trial. As

⁹ See Ameritech's CAM, amended on October 22, 1996, attached to the CEI plan. Attachment E, p. II-3.

¹⁰ See Market Trial Notification for Ameritech's Trial of an Enhanced Service, Payphone Message Delivery Service, filed May 2, 1995 ("Notification"). In that Notification, Ameritech stated that the trial was to begin no earlier than August 1, 1995 and terminate no later than eight months following its commencement.

part of its CEI plan, Ameritech should also explain how it will offer the basic tariffed service, to be used with MDS, that notifies payphone service providers that a busy or no answer condition exists.

Finally, Ameritech's CEI plan does not address Ameritech's proposed treatment of uncollectibles due to fraud. To the extent that Ameritech establishes a policy of foregoing uncollectibles due to fraud for its payphone service affiliates, the same treatment must be accorded to non-affiliates, regardless of whether such practice appears in Ameritech's tariffs. In order to ensure such nondiscriminatory treatment, Ameritech should be required to modify its CEI plan to address this issue directly.

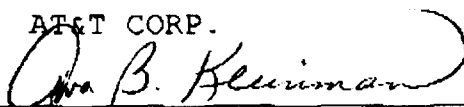
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For the reasons stated above, before Ameritech's
CEI plan is approved, Ameritech should clarify its plan
consistent with AT&T's comments above.

Respectfully submitted,

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January 3, 1997

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 3rd day of January, 1997, a copy of the foregoing "AT&T's Comments on Ameritech's Comparably Efficient Interconnection Plan" was mailed by U.S. first class mail, postage prepaid, to the parties listed below.

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